

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RUSTEM KAZAZI, et al.) CASE NO.: 4:18-mc-00051-DAP
)
Movants,) JUDGE DAN AARON POLSTER
)
v.)
)
U.S. CUSTOMS AND BORDER)
PROTECTION, et al.) STIPULATED DISMISSAL
)
Respondents.)
)

Now come Respondents, by and through Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Assistant United States Attorneys Renée A. Bacchus and Lisa Hammond Johnson, and Petitioners Rustem Kazazi, Leila Kazazi, and Erald Kazazi, by and through Robert McNamara, Senior Attorney, Institute for Justice, who hereby stipulate that the parties have resolved their dispute regarding the remaining \$770 sought by Petitioners in their Rule 41(g) motion before this Court. (ECF # 1.) The parties have agreed that Petitioners may move this Court for attorneys' fees pursuant to 28 U.S.C. § 2465. Respondents specifically deny that Petitioners are entitled to attorneys' fees and reserve the right to oppose any motion for fees filed by Petitioners.

The parties respectfully request that this Court accept their stipulation and dismiss this case with prejudice.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney
Northern District of Ohio

/s/ Robert McNamara
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, a copy of the foregoing Stipulated Dismissal was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/*Renée A. Bacchus*

Renée A. Bacchus
Assistant U.S. Attorney